

1 RICHARD M. WILLIAMS (SBN 68032)
2 J. MARK THACKER (SBN: 157182)
3 ROPERS, MAJESKI, KOHN & BENTLEY
4 50 W. San Fernando Street, Suite 1400
5 San Jose, CA 95113
6 Telephone: (408) 287-6262
7 Facsimile: (408) 918-4501

e-filed 7/18/08

5 Attorneys for Defendants
6 KELLY M. LAUGHRIN and CAMPBELL,
7 WARBURTON, FITZSIMMONS, SMITH,
8 MENDELL & PASTORE

9
10
11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA

13
14 NEW AMSTERDAM PROJECT
15 MANAGEMENT HUMANITARIAN
16 FOUNDATION, a Dutch non-profit
17 corporation,

18 Plaintiff,

19 v.

20 KELLY M. LAUGHRIN, CAMPBELL,
21 WARBURTON, FITZSIMMONS, SMITH,
22 MENDELL & PASTORE, a California
23 corporation; and DOES 1 through 25,

24 Defendants.

25 CASE NO. 5:07-cv-00935-JF

26 **STIPULATION AND ORDER RE:
27 INTERIM ORDER ON PLAINTIFF'S
28 MOTIONS TO COMPEL DISCOVERY**

29 The parties, by and through their respective counsel, hereby agree and stipulate as follows:

30 1. The Court has issued an Interim Order on Plaintiff's Motions to Compel Discovery
31 requiring, among other things, the submission by Defendants on or before July 23, 2008 of a
32 complete and revised privilege log, and a declaration by the author of the handwritten notes
33 appearing on Plaintiff's Exhibit 47 (Document No. CAM00056).

34 2. Both Nicholas Pastore, Shareholder and President/Secretary of Defendant
35 CAMPBELL, WARBURTON, and Michael Fitzsimmons, Shareholder and Vice-
36 President/Treasurer of Defendant CAMPBELL, WARBURTON and author of the handwritten
37 notes on Plaintiff's Exhibit 47, will be on vacation and unavailable to consult with respect to the
38 notes on Plaintiff's Exhibit 47.

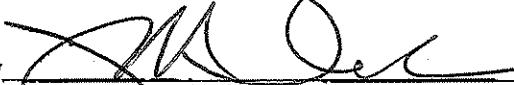
1 matters required for submission to the Court by the Interim Order until July 28, 2008 and July 25,
2 2008, respectively.

3 3. Plaintiff's counsel has agreed to an extension of the deadlines for Defendants to
4 comply with the Court's Interim Order on the condition that all deadlines be extended, in order to
5 avoid the potential unfairness and being placed in a strategically disadvantageous position.

6 4. Based on the foregoing, the parties stipulate to the following: (1) The privilege log
7 and declaration required by the Court's Interim Order shall be submitted not later than August 1,
8 2008. (2) Defendants shall produce all documents initially withheld on the basis of third party
9 privacy rights on or before August 1, 2008. (3) Plaintiff's supplemental brief on the issues of
10 "business advice" and the necessity for a showing that the attorney knew the client was using his
11 services to commit a crime or fraud, shall be submitted not later than August 1, 2008, and
12 Defendant's reply shall be submitted not later than August 8, 2008. (4) Plaintiff may identify
13 additional exhibits in support of its submission that Defendants were retained to aid Margaret
14 Laughrin's fraudulent activities not later than August 1, 2008.

15 Dated: July 18 2008

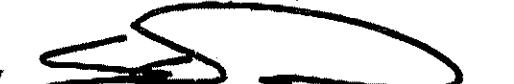
ROPER, MAJESKI, KOHN & BENTLEY

16 By 

17 J. MARK THACKER
18 Attorneys for Defendants

19 Dated: July 18, 2008

DEMPSEY & JOHNSON, P.C.

20 By 

21 STEPHEN C. JOHNSON
22 Attorneys for Plaintiff

23
24 IT IS ORDERED:
25
26 Dated: 7/18/08

27 ORDER

28 
HON. HOWARD R. LLOYD
UNITED STATES MAGISTRATE JUDGE